

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

X.J., a minor, by his parent and natural  
guardian, YESINIA NEGRON,

Plaintiff,

v.

POLICE OFFICER KEEN, et al.,

Defendants.

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Civil Action No. 22-1304

**MOTION TO APPROVE SETTLEMENT OF A  
MINOR PURSUANT TO LOCAL RULE 41.2**

1. The within action is a claim brought pursuant to 42 U.S.C. § 1983 by the minor Plaintiff X.J.
2. In his Complaint the minor Plaintiff alleges that he was subjected to an unreasonable search and seizure in violation of his rights guaranteed by the Fourth Amendment to the United States Constitution.
3. That the Defendants have made an offer of \$15,000.00 in full and final settlement of any and all claims which the minor might have arising out of the incident which is the subject of this law suit.
4. The Defendant police officers do not admit liability but rather contend they acted reasonably at all times.
5. It is the professional opinion of the undersigned counsel that the offer of settlement is reasonable and in the best interest of the minor Plaintiff.
6. If the Court approves this settlement, distribution of the settlement funds would be as follows.

Total Settlement ..... \$15,000.00

To the minor Plaintiff ..... \$10,000.00

To Patrick G. Geckle, Esquire, attorney's fees and costs ..... \$ 5,000.00

Counsel incurred the following cost in connection with the prosecution of this matter.

( a) Clerk, U.S. District Court, filing of Complaint, ..... \$402.00

Counsel was retained on a one-third (1/3) Contingent Fee basis. The above referenced cost will be absorbed by Counsel and the minor Plaintiff will not be charged for these costs.

Pursuant to Rule 41.2 of the Local Rules of the Eastern District of Pennsylvania the full amount of the minor's settlement proceeds, \$10,000.00, will be placed in a federally insured account marked with the restriction, "not to be withdrawn until the minor attains his majority or upon further order of a Court of competent jurisdiction."

WHEREFORE, Plaintiff respectfully moves this Honorable Court for an Order approving settlement of this claim and further approves the above described distribution of the settlement funds.

Respectfully submitted,

**PATRICK G. GECKLE, LLC**

By: /s/ Patrick G. Geckle

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